



AT&T

Patrick W. Turner
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December 12, 2019

The Honorable Jocelyn Boyd
Chief Clerk of the Commission
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29211

Re: TCA's Petition Requesting the Commission's Intervention in Numbering
Resources Determinations -- Mount Pleasant Rate Center

Dear Ms. Boyd:

Teleport Communications America, LLC ("TCA") respectfully encloses for filing a Petition for Review of Numbering Resources Determination in the Mount Pleasant rate center in the above-captioned matter. In summary:

TCA submitted an NXX Assignment Request via the Pooling Administration System on November 26, 2019;

TCA's customer requesting numbering resources is Columbus McKinnon Corporation;

TCA requested the assignment of a thousands-block in the Mount Pleasant rate center in the format of 843-NXX-XXXX where the block does NOT start with 7, and blocks 843-XXX-0, 8, and 9 are undesirable;

The request impacts the Mount Pleasant rate center;

At the time of the filing of the numbering resource request, the Mount Pleasant Rate Center had an MTE of 8.183 and utilization of 73.7%.

By copy of this letter, I am serving a copy of this document on all parties of record as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/sh
Enclosure

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re: TELEPORT COMMUNICATIONS AMERICA, LLC)
 PETITION REQUESTING THE COMMISSION'S)
 INTERVENTION IN NUMBERING RESOURCES)
 DETERMINATIONS)

PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION
IN THE MOUNT PLEASANT RATE CENTER

Teleport Communications America, LLC ("TCA"), pursuant to rules adopted by the Federal Communications Commission ("FCC") for challenging numbering determinations, petitions the Public Service Commission of South Carolina ("Commission") for review of a recent denial of TCA's application for use of numbering resources in the 843 area code. Numbering determinations are made by the North American Numbering Plan Administrator ("NANPA") and/or the Pooling Administrator ("PA"), depending on the nature of the numbering request. The FCC's rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading "Central office code administration,"¹ and the FCC's Orders addressing these matters allow for challenges of determinations by both entities.² Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the requested relief to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts TCA's customer Columbus McKinnon.

¹ See, e.g., 47 C.F.R. §52.15.

In support of this Petition, TCA states:

1. TCA is a telephone utility that provides, among other things, intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Mount Pleasant exchange.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP").³

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.⁴

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.⁵ The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's rate center will be exhausted within six months of the application. The FCC reaffirmed this requirement in two subsequent orders.⁶ Prior to this ruling, the Central Office Code Assignment

² See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) ("*Third NRO Order*").

³ See 47 C.F.R. § 52.13 (a), (b).

⁴ See 47 C.F.R. §52.7(g). See also 47 C.F.R. §52.20 ("Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.").

⁵ See Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) ("*First NRO Order*").

⁶ See Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶29 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.⁷ The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.⁸

7. On or about November 26, 2019, TCA submitted a Pooling Administration System request for the assignment of a thousands-block in the Mount Pleasant rate center to integrate into its customer's existing dialing plan. The request was for the block to be of the format: 843-NXX-XXXX where the block does NOT start with 7, and blocks 843-XXX-0, 8, and 9 are undesirable. In order to meet the customer's express request for numbers,⁹ TCA requested the assignment of one thousands-block in the Mount Pleasant rate center.¹⁰ TCA does not have the existing numbers to meet the customer's request.

8. TCA's application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and TCA filled out the necessary MTE Certification Worksheets as required.

⁷ See *Second NRO Order* at ¶22; *Third NRO Order* at ¶¶50-52.

⁸ *Third NRO Order* at ¶¶50-52.

⁹ See Exhibit A to this Petition.

¹⁰ See Exhibit B to this Petition.

9. At the time of the filing of the numbering resource request, the Mount Pleasant Rate Center had an MTE of 8.183 months and a utilization of 73.7%.¹¹

10. Thereafter, also on November 26, 2019, TCA's request was denied because TCA had not met the MTE and/or Utilization requirements set forth in the INC Guidelines.¹² TCA's numbering resource requests were denied despite the fact that TCA does not have adequate numbering resources needed to satisfy this customer's demands in the Mount Pleasant Rate Center.

11. TCA's inability to provide this important customer with the requested numbering resources prevents TCA from providing the quality of service this customer desires, needs, and expects. If TCA is not assigned the numbering resources needed to meet the customer's request, TCA will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources."¹³

12. Both the FCC's rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.¹⁴

¹¹ See *Id.*

¹² See *Id.*

¹³ *Second NRO Order* at ¶ 61.

¹⁴ See *Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) ("The carrier may challenge the NANPA's decision to the appropriate state regulatory commission"); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009, § 13.0 (rev. April 26, 1999)(CO Code Guidelines) ("Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").

13. Prior to the FCC's Order and the resulting change in the INC Guidelines, the applicable MTE procedures permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under today's procedures, numbering determinations are based on the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief "if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory."¹⁵ In addition, the FCC has ruled that, "States...may grant requests for customers seeking contiguous block of numbers."¹⁶

14. TCA requests that the Commission reverse the decision to withhold numbering resources from TCA because that decision interferes with TCA's ability to provide telecommunication services to its customers.

15. This Commission (see Docket No. 2002 –185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to TCA to meet customer needs.

WHEREFORE, TCA requests that the Commission:

- A. Reverse the decision to deny TCA's request for additional numbering resources;
- B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide a thousand block

¹⁵ *Third NRO Order* at ¶ 64.

¹⁶ *Id.*

in the Mount Pleasant rate center that does NOT start with 7, and this in NOT in blocks 843-XXX-0, 8, or 9; and

- C. Grant the requested relief as soon as possible.

Respectfully submitted this 12th day of December 2019.



Patrick W. Turner
One CNN Center, SW1424B
Atlanta, GA 30308
(404) 893-7940

ATTORNEY FOR TELEPORT
COMMUNICATIONS AMERICA, LLC

STATE OF SOUTH CAROLINA)
)
 COUNTY OF RICHLAND) **CERTIFICATE OF SERVICE**

The undersigned, Susan Hodge, hereby certifies that she is employed by the Legal Department for AT&T South Carolina and that she has caused AT&T South Carolina's Petition for Review of Numbering Resources Determination in the Mount Pleasant Rate Center to be served by the method indicated below upon the following this 12th day of December, 2019:

Beth Sprague
 NANPA
 Somos
 2411 Dulles Corner Park Suite 250
 Herndon, VA 20171
(Electronic Mail)

John Auerbach
 National Pooling Administrator
 Somos
 1800 Sutter Street, Suite 780
 Concord, CA 94520
(Electronic Mail)

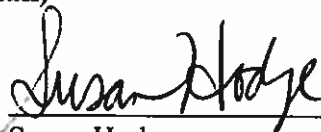
F. David Butler, Esquire
 General Counsel
 S. C. Public Service Commission
 Post Office Box 11649
 Columbia, South Carolina 29211
 (PSC Staff)
(Electronic Mail)

Jocelyn G. Boyd, Esquire
 Chief Clerk
 S. C. Public Service Commission
 Post Office Box 11649
 Columbia, South Carolina 29211
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 jocelyn.boyd@psc.sc.gov
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Daphne Duke
S. C. Public Service Commission
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Joseph Melchers
General Counsel
S.C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail)

Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
(Electronic Mail)

A handwritten signature in black ink, appearing to read "Susan Hodge", is written over a horizontal line.

Susan Hodge

EXHIBIT A

COLUMBUS MCKINNON CORPORATION
 205 Crosspoint Parkway, Getzville, New York 14068 716.689.5400 Fax: 716.689.5644 www.cmworks.com

Partners in Motion Control



November 15, 2019

Columbus McKinnon
 2284 Clements Ferry Rd Unit E
 Charleston SC 29492

TNAC:

Please accept this Letter of Intent requesting additional numbering resources. Columbus McKinnon requests 100 numbers in the MTPLEASANT rate center.

Columbus McKinnon is a leading worldwide designer, manufacturer and marketer of motion control products, technologies, systems and services that efficiently and ergonomically move, lift, position and secure materials.

Columbus McKinnon currently utilizes [REDACTED] with AT&T. Columbus McKinnon is looking to add an existing location as a new [REDACTED] under [REDACTED]. In addition to porting numbers, Columbus McKinnon requires 100 new TNs. Currently AT&T only has the following available, 843-xxx-7xxx. Columbus McKinnon cannot use 7xxx block as the 4-digit dialing pattern using 7xxx is already in use. This would create duplicates. Columbus McKinnon requires the 100 TNs to be in the following format 843-xxx-uuxx where uu can be one of the following;

10xx, 20xx, 21xx, 22xx, 23xx, 24xx, 25xx, 26xx, 27xx, 28xx, 29xx, 30xx, 34xx, 35xx, 36xx, 37xx, 38xx, 39xx, 40xx, 41xx, 44xx, 45xx, 46xx, 47xx, 48xx, 49xx, 50xx, 51xx, 52xx, 53xx, 59xx, 65xx, 66xx and 67xx. These do not need to be consecutive.

Pending AT&T's successful completion of testing, Columbus McKinnon understands these numbers will need to be activated within 180 days of the effective date. Columbus McKinnon will not be returning any numbers.

Mark Paradowski
 Vice President of Information Services
 Mark.Paradowski@cmworks.com
 716-689-5590

EXHIBIT B

Tracking Number: **854-MTPLEASANT-SC-1200371**

Thousands-Block (NPA-NXX-X) Application - Part 1A
Revised: October 31, 2019

**Individual Block
Request**

Type of Application: ☒ New ☐ Change ⁱ ☐ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **TELEPORT COMMUNICATIONS AMERICA - SC - LLC**
Headquarters Address: **5001 EXECUTIVE PARKWAY 3W200L**
City: **San Ramon** State: **CA** ZIP: **94583**
Contact Name: **Rowena Brown**
Contact Address: **5001 EXECUTIVE PARKWAY 3W200L**
City: **San Ramon** State: **CA** ZIP: **94583**
Phone: **925-543-1526** Fax: **925-355-9268**
E-mail: **rb2548@att.com**

Pooling Administrator:ⁱⁱ

Contact Name: **John Auerbach**
Contact Address: **1800 Sutter St. Ste. 780**
City: **Concord** State: **CA** ZIP: **94520**
Phone: **925-420-0343** Fax: **925-420-0377**
E-mail: **jauerbach@somos.com**

1.2 General Information:

Check one : No LRN needed ____ LRN neededⁱⁱⁱ: ____

NPA: 854 LATA: 436 OCN^{iv}: 635C Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 1

Switch Identification (Switching Entity/POI^v):
CHTNSCDTX5Z

Rate Center^{vi}: MTPLEASANT

1.3 Dates:

Date of Application^{vii}:
11/26/2019

Requested Effective Date^{viii}:
01/06/2020

Requested Expedited Treatment? (See Section 8.6) Yes ____ No X

☒ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : CAP OR CLEC (LEC, IXC, CMRS, Other)
- b) Primary Type of Service Blocks to be used for : Other
- c) Thousands-Block(s) (NXX-X) assignment preference (Optional) 843-XXX-1-6
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any 843-XXX-0.7.8.9
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) _____

1.5 Type of Request:

Initial block for rate center : Yes ____ If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes, attach months to exhaust worksheet

☒ By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change (Mark all that apply)

☐ OCN: Intra-company^{ix} ☐ Switching Id ☐ Part 1B

☐ OCN: Inter-company^x ☐ Effective Date

Change block : Yes ____ If Yes, list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated: Yes _____ No _____
- b) If Yes how many TNs are NOT available for assignment : _____
- c) Have all new Intra SP ports been completed in the NPAC: Yes _____ No _____
- d) Has this block been protected from further assignment: Yes _____ No _____

Disconnect block : Yes _____ If Yes, list NPA-NXX-X _____

Remarks:

I hereby certify that the above information requesting a Thousands-Block (NPA-NXX-X) is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block and Central Office Code Administration Guidelines (TBCOCAG) available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

Rowena Brown**Senior Network Specialist****11/26/2019**

Signature of Block Applicant

Title

Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers (SP) supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator (PA) section also requires the SP to fill in the PA's name, address, phone, fax and e-mail.

Section 1.2 Service Providers (SP) who need a Thousands-Block (NPA-NXX-X) assignment or for a Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a Part 1 Central Office Code (NPA-NXX) Application needs to also be submitted to the Pooling Administrator (PA). The SP should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia Technologies, Inc. dba iconectiv (iconectiv®) LERG™ Routing Guide^{xi}. The Operating Company Number (OCN) assigned to the SP and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectiv Telecom Routing Administration (TRA). In addition, the number of Thousands-Blocks requested should be supplied. The Switch Identification (Switching Entity/POI). Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider (SP) completes the application should be entered in this section, as well as the Effective Date of the requested Thousands-Block.

Section 1.4 Service Providers (SP) should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS or VoIP. Also indicate the primary type of business in which the Numbering Resource is to be used. SPs may indicate their preference for a particular Thousands-Block, e.g., 321-9XXX, or indicate any Thousands-Blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers (SP) indicate the type of request. Initial requests are for first applications for Thousands-Blocks in a Rate Center, Growth applications are for additional Thousands-Blocks in a Rate Center in which the Applicant already has Numbering Resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers (SP) shall indicate the updated/current information in regards to contaminated Telephone Numbers (TN) on the Thousands-Block they are returning to the Industry Inventory Pool. Thousands-Blocks with over 10% contamination (101 TNs or more) shall not be returned to the Industry Inventory Pool except when a SP is exiting the market or is exchanging a Thousands-Block that was identified as being over 10% contaminated. If the Thousands-Block being returned is over 10% contaminated, the Pooling Administrator (PA) shall seek a new Thousands-Block Holder. If question c and/or d have a response of No, the request for return shall be denied.

The Thousands-Block applicant certifies veracity of this form by signing their name, and providing their title and date.

Footnotes:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator (PA) is available to assist in completing these forms.

ⁱⁱⁱA Part 1 Central Office (CO) Code (NPA-NXX) Application shall also need to be submitted to the Pooling Administrator (PA).

^{iv}Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to TRA (732-699-6700).

^vThis is an eleven-character descriptor of the Switching Entity/Point Of Interconnection (POI) provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM Code of the Switching Entity/POI.

^{vi}Rate Center name shall be a tariffed Rate Center.

^{vii}Acknowledgment and indication of disposition of this application shall be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{viii}Please ensure that the Central Office (CO) Code (NPA-NXX) of the LRN to be associated with this Thousands-Block(s) is/will be active in the PSTN prior to the effective date of the Thousands-Block(s).

^{ix}Select if you are the current Thousands-Block Holder.

^xSelect if you are not the current Thousands-Block Holder.

^{xi}iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCI[™], CLI[™], LERG[™] Routing Guide and TPM[™] Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

Thousands-Block Months to Exhaust Certification Worksheet - TN Level¹ - Appendix 2
Revised: October 31, 2019

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **854-MTPLEASANT-SC-1200371**

Date: **Tuesday, November 26, 2019** OCN: **635C** Company Name: **TELEPORT COMMUNICATIONS AMERICA - SC - LLC**

Rate Center: **MTPLEASANT**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: **843-416-7, 843-972-6,**

Name of Block Applicant: **Rowena Brown**

Signature: **Rowena Brown**

Title: **Senior Network Specialist**
925-355-9268

Phone: **925-543-1526-**

Fax:

E-Mail: **rb2548@att.com**

A. Available Numbers³: **521**

B. Assigned Numbers: **1474**

C. Total Numbering Resources⁴: **2000**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation⁵: **0**

List
Excluded
Code(s) or
Block(s):

Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
1	2	3	4	5	6	7	8	9	10	11	12	

E. Growth
History -
Previous 6 months⁶

<u>128</u>	<u>27</u>	<u>111</u>	<u>8</u>	<u>5</u>	<u>0</u>
------------	-----------	------------	----------	----------	----------

F. Forecast -
Next 12 months⁷

<u>147</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>	<u>47</u>
------------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)⁸: 63.667

H. Months
to Exhaust⁹

$$= \frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	521	8.183

I.
Utilization¹⁰

$$= \frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 = \underline{73.7}$$

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Pooling Administrator (PA) when requesting additional Numbering Resources in a rate center. For auditing purposes, the applicant shall retain a copy of this document.

²List all Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired Central Office (CO) Codes (NPA-NXX) and Thousands-Blocks (NPA-NXX-X). This information is available from the Total Numbering Resources in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

³The total quantity of numbers available for assignment from the Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁴The total quantity of Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁵Quantity of numbers activated in the past 90 days indicates newly acquired Thousands-Blocks (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

⁶Net change in Telephone Numbers (TN) no longer available for assignment in each previous month, starting with the most distant month as Month 1, and Month 6 as the current month.

⁷Forecast of Telephone Numbers (TN) needed in each following month, starting with the most recent month as Month 1.

⁸This field is automatically calculated and populated on this form in PAS.

⁹This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

¹⁰This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly acquired Numbering Resources may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii)).

From: jauerbach@somos.com
Sent: Tuesday, November 26, 2019 10:47 PM
To: BROWN, ROWENA R
Cc: PA_Part3@somos.com
Subject: , 854-MTPLEASANT-SC-1200371 DENIED PAS - Part 3A Confirmation

Pooling Administration System

Dated 26 November 2019

Pooling Administrator's Response/Confirmation - Part 3A

Revised: October 31, 2019

Tracking Number : 854-MTPLEASANT-SC-1200371

Date of Application: 11/26/2019 Effective Date: _____
Date of Receipt: 11/26/2019 Date of Response: 11/26/2019

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA - SC - LLC
(LERG™ Routing Guide¹)
OCN: 635C
Parent Company OCN: 7125

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

John Auerbach Phone: 925-420-0343
Signature of Pooling Administrator
John Auerbach Fax: 925-420-0377
Name (print)
Email: jauerbach@somos.com

NPA-NXX or NPA-NXX-X : _____ Block Assigned: _____
Block Reserved : _____
Block Reservation Expiration Date : _____
Block/Code Modified : _____

Block/Code
Disconnected :

Block Contaminated (Yes or No):

If yes, enter the number of TNs contaminated (1-1000):

Switch Identification (Switching/POI)²:

CHTNSCDTX5Z

Rate Center:

MTPLEASANT

☒ Form complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3A denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines for the appeals process.

☐ Request Withdrawn.

Explanation:

☐ Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

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² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the Common Language Location Code (CLLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.